## UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD

MANOR CARE OF ALLENTOWN PA, LLC d/b/a MANORCARE HEALTH SERVICES - ALLENTOWN,

Employer,

Case 06-RC-186558

and

RETAIL, WHOLESALE AND DEPARTMENT STORE UNION, RWDSU, UNITED FOOD AND COMMERCIAL WORKERS, ALF-CIO,

Petitioner.

## EMPLOYER'S REQUEST FOR EXTENSION OF TIME TO FILE ANY REQUESTS FOR REVIEW

COMES NOW, the Employer, Manor Care of Allentown PA, LLC, by and through its attorneys of record, and hereby requests a 10-day extension of the period for filing any requests for review in this matter, for a due date for filing of March 6, 2017. The extension is requested due to the complexity of the facts and the procedural history of the case. The Employer's counsel contacted the Petitioner's counsel with respect to Petitioner's position on the request. The Petitioner's counsel indicates that Petitioner opposes this request, as per the email attached.

Respectfully submitted this 15th day of February, 2017.

Clifford H. Nelson Ir

Constangy, Brooks, Smith & Prophete, LLP 230 Peachtree Street, NW, Suite 2400 Atlanta, Georgia 30303

(404) 230-6714 Fax: (678-999-7849 cnelson@constangy.com

David P. Phippen

Constangy, Brooks, Smith & Prophete, LLP 12500 Fair Lakes Circle, Suite 300 Fairfax, VA 22033 (571) 522-6105

Fax: (571) 522-6101 dphippen@constangy.com

Phippen, David	 		

Subject

FW: ManorCare Allentown Request for Review Deadline KNGY-WORKSITE.FID16907721

From: Larry Cary [mailtodcary@carykane.com]
Sent: Tuesday, February 14, 2017 10:02 AM
To: Phippen, David <dphippen@constangy.com>

Subject: Re: ManorCare Allentown — Request for Review Deadline [CNGY-WORKSITE.FID1690772]

We oppose as we believe the employers position to be frivolous only intended to have nor time pass before being required to negotiate. I rarely oppose a request for an extension but this is the exception to the rule. Please fully include my position

In any request for an extension. Sent from my [Phone]

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## **CERTIFICATE OF SERVICE**

I certify I have electronically filed the foregoing EMPLOYER'S REQUEST FOR EXTENSION OF TIME TO FILE ANY REQUESTS FOR REVIEW with the National Labor Relations Board's e-filing service. I have also e-mailed a copy to:

Hon. Nancy Wilson
Regional Director
National Labor Relations Board, Region 6
Nancy.Wilson@nlrb.gov
and
Larry Cary, Esq.
Cary Kane
lcary@carykane.com

This 15th day of February, 2017.

David P. Phippen

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